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November 30, 2021

## **VIA ECF**

The Honorable Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: *U.S. v. Brajan Tola* **20 CR 660 (RA)** 

Dear Judge Abrams:

I am the attorney for Brajan Tola in the above-referenced matter. On December 10, 2020, Mr. Tola was released on a \$100,000 personal recognizance bond co-signed by 3 financially responsible persons with travel restricted to the Southern and Eastern Districts of New York and surrender of his passport to Pretrial Services. The purpose of this letter is to respectfully request that Mr. Tola's be permitted to obtain his passport from Pretrial Services, at their discretion, for 3 weeks, in order to obtain a New York State Identification Card, a DMV driving permit, and to open a bank account with his fiancé. For Mr. Tola to receive these documents and to open a bank account, he needs to apply in person, with his passport for identification. Once he completes these tasks, he will immediately surrender his passport back to Pretrial Services. Both the Government and Pretrial Services consent to this request. Accordingly, it is respectfully requested that Mr. Tola be permitted to obtain his passport for 3 weeks. The Court's time and consideration of this matter are greatly appreciated.

Respectfully submitted,

/s/

Margaret M. Shalley

cc: The Honorable Sarah Netburn (*via ECF*)
All Counsel (*via ECF*)
USPSO Dayshawn Bostic (*via email*)

Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J. November 30, 2021